

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

U.S. DISTRICT COURT
DISTRICT OF MAINE
RECEIVED & FILED

UNITED STATES OF AMERICA

Mag. No: 1:23-mj-00188-JCN 2023 JUN 22 P 3:19

v.

ALAN HOWELL PARROT

DEPUTY CLERK

MOTION FOR DETENTION

The United States moves for pretrial detention of the defendant, pursuant to 18 U.S.C. § 3142.

1. Eligibility of Case. This case is eligible for a detention order because the case involves:

- ☐ Conditions requiring a temporary detention order (18 U.S.C. § 3142(d))
- ☒ Crime of violence
- ☐ Maximum sentence life imprisonment or death
- ☐ 10+ year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice

2. Reasons for Detention.

(i) Temporary Detention. _____

(ii) Other than Temporary Detention. The court should detain the defendant because there are no conditions of release which will reasonably assure:

X Defendant's appearance as required

X Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against the defendant under 18 U.S.C. § 3142(e). The presumption applies because:

____ Probable cause to believe the defendant committed 10+ year drug offense or an offense under 18 U.S.C. § 924(c).

____ Previous conviction for "eligible" offense committed while on pretrial bond.

4. Date of Detention Hearing. The United States requests that the detention hearing be conducted following a continuance of three days.

5. Length of Detention Hearing. The United States will require a half hour to present its case for detention.

6. Other Relevant Matters. N/A

Date: June 22, 2023

DARCIE N. MCELWEE
United States Attorney

BY: /s/ JOEL B. CASEY
JOEL B. CASEY
Assistant United States Attorney
United States Attorney's Office
202 Harlow Street
Bangor, Maine 04101
(207) 945-0373
Joel.Casey@usdoj.gov

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2023, I filed the Government's Motion for Detention with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

James Nixon, Esq.
Counsel for the Defendant

DARCIE N. MCELWEE
United States Attorney

/S/ Joel B. Casey
Assistant United States Attorney
United States Attorney's Office
202 Harlow Street
Bangor, Maine 04101
(207) 945-0373
Joel.Casey@usdoj.gov